

## Issue 1

# Commodity Specific Food Safety Guidelines for the Production and Harvest of lettuce and Leafy Greens Process Verification Review

Company Name, Address, Phone Number:	
	Date Start/End:
	Start time:
	End time:
	Lunch/Dinner time, if taken:
Name & Title of Company Escort (Circle if <b>Declined</b> ):	
Name of Auditor(s):	
Processes Reviewed:	
Location of Review:	

<b>Grower</b>	<b>Harvester</b>	<b>Handler</b>	<b>Other(Specify):</b>
<b>Grower or harvester or cooler name and address, if different from Company shown above.</b>			

## Audit Criteria

	Pre-Requisite Criteria		Work Practices
	Water Use and Testing		Field Sanitation
	Soil Amendments		Field Observations
	Environmental Factors		

This report is to provide information about the above referenced person, persons or organization's adherence to the *Commodity Specific Food Safety Guidelines for the Production and Harvest of Lettuce and Leafy Greens* (16 March 2007 Revision). It does not provide any level of verification or certification that the processes verified are effective to reduce microbial contamination in Leafy Greens.

### Directions:

#### Handler:

Identify location of documentation to support each question on the Process Verification Review template. (Handler, Grower, Harvester or 3rd Party)

Provide a current Grower Ranch List.

Maintain a current<sup>1</sup> record of required documentation (1: file within 7 days) (file date noted)

Maintain records for period of at least two years.

Be prepared to provide this information upon arrival of the Auditor.

#### Grower:

Provide information as required by the Handler in a timely fashion.

Maintain records for period of at least two years.

## Lettuce and Leafy Greens Verification Audit

### Pre-Requisite Requirements

#### Record

#### Location

#### Finding

#### Status

#### Comment

#### General Requirements

1.1	Is a written Leafy Greens Compliance Plan which specifically addresses the Best Practices of the LGMA available for review?				
1.2	Is an up to date growers list with contact and location information available for review?				
1.3	Is the handler in compliance with the registration requirement of The Public Health Security and Bioterrorism Preparedness and Response Act of 2002?				
<b>GAP Requirements</b>					
2.1	Is there a written GAP program available for review?				
2.2	Does it specifically address the following subjects consistent with the LGMA:				
2.2.1	Water				
2.2.2	Soil Amendments				
2.2.3	Environmental Factors				
2.2.4	Work Practices				
2.2.5	Field Sanitation				
2.3	Has the Handler designated someone to implement and oversee the food safety program?				
2.3.1	Is the name of the individual available?				
2.3.2	Is 24/7 contact information for the individual available?				
2.4	Is a written Traceback Manual available for review?				
2.4.1	Does it enable identification of immediate non-transporter previous sources?				
2.4.2	Does it enable identification of immediate non-transporter subsequent recipient?				

#### Section Score

# Lettuce and Leafy Greens Verification Audit

Water Use					
		Record Location	Finding	Status	Comment
General Requirements					
1.1	Is a ranch map with all sources of water and distribution systems clearly identified available for review?				
Pre-Harvest Foliar and non-Foliar Water Applications Table 1 & Figure 1A & 1B					
2.1	Is the 5-sample geometric mean less than or equal to 126 MPN/100 ml?				
2.2	Are all individual samples less than or equal to 235MPN/100 ml (foliar) or 576 MPN/100m ml (non-Foliar)?				
	If the answer to Q 2.1 or Q 2.2 is "No" then proceed to 2.3.1 thru 2.3.5.2, otherwise go to Q 2.4				
2.3.1	The water system was discontinued after the tests indicated the water source failed to meet the minimum water quality requirements.				
2.3.2	A sanitary survey was completed on the water source and distribution system for possible contamination.				
2.3.3	Records show that corrective actions were taken to eliminate the contamination sources.				
2.3.4	Samples for the required water retesting were taken at the previous sampling point.				
2.3.4.1	One water test was taken daily (not less than 18 hours apart) for 5 days.				
2.3.4.2	These 5 test results met the acceptance criteria: average less than 126 MPN/100ml ( based on rolling geometric mean=5) and no sample exceeded greater than 235 MPN/100 ml (foliar) or 576 MPN/100 ml (non-foliar).				
2.3.5	Records show the water system was not used while the water quality was inadequate.				
2.3.5.1	If "No" to 2.3.5 then was product sampled for E coli 157:H7 and Salmonella.				
2.3.5.2	Or records show that the crop was not harvested for human consumption when the tests were positive for E coli O157:H7 or Salmonella.				
2.4	Was a source water test conducted for each source of water within 60 days of first use on post germinated fields?				
2.5	Are records available to demonstrate that water samples have been collected from each water distribution system within the last 30 days				
2.5.1	Is the source water from a municipal supply or well?				
2.5.1.1	Are 5 consecutive monthly samples below the generic E. coli detection limit on record (2.2 MPN)?				
2.5.1.2	Is the last sample recorded within 6 months of the audit date?				
2.6	Can the water test record be linked to individual field blocks?				
2.7	The person collecting the sample is recorded.				
2.8	The location where the sample was taken is recorded.				
2.9	Show the name of the test laboratory.				
2.10.	A 100 ml water sample was aseptically collected at the point of use.				

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2.11	The generic E.coli testing methodology is specified on the test report and meets the 15 tube MPN (FDA BAM) or other U.S. EPA, AOAC, or other method accredited for quantitative monitoring of water for generic E. coli.				
2.12	Records show that the water samples are taken no less than 18 hours apart.				
<b>Post Harvest- Direct Produce Contact or Food Contact Surfaces</b>					
<b>Table 1 &amp; Figure 1C</b>					
3.1	Is the water from a source that meets the USEPA MCLG for microbial quality- Negative per 100ml (<2.2 MPN/100ml)				
3.1.1	If "No" to 3.1 above has the water received sufficient disinfection to meet the USEPA MCLG for microbial quality?				
3.2	If the water is reused, is sufficient disinfection added and monitored to prevent possible cross-contamination? (Chlorine-more than 1ppm free chlorine and PH 6.5-7.5 or ORP-more than 650mV or other approved treatment per product EPA label for human pathogen reduction in water.)				
3.3	Was a source water test conducted for each source of water within 60 days of first use?				
3.4	Are records available to demonstrate that water samples or monitoring results have been collected from each water distribution system within the last 30 days				
	If the answer to Q 3.1 or Q 3.2 is "No" then proceed to Q 3.4.1 thru Q 3.4.6.2 otherwise go to Q 3.5				
3.4.1	Was use of the water system discontinued after the tests indicated the water source failed to meet the minimum water quality requirements?				
3.4.2	Was a sanitary survey completed on the water source and distribution system for possible contamination?				
3.4.3	Do records show that corrective actions were taken to eliminate the contamination sources?				
3.4.4	Were samples for the required water retesting taken at the previous sampling point?				
3.4.5	Was one water test taken daily (not less than 18 hours apart) for 5 days at the point closest to use?				
3.4.5.1	Did these 5 test results met the acceptance criteria: less than 2.2 MPN/100ml?				
3.4.6	Do records show the water system was not used while the water quality was inadequate?				
3.4.6.1	If "No" to Q 3.4.6, then was product sampled for E coli 157:H7 and Salmonella?				
3.4.6.1.1	Do records show that the crop was not harvested for human consumption when the tests were positive for E coli O157:H7 or Salmonella?				
3.4.6.2	If "No" to Q 3.4.6.1, do the records show that the product was not harvested?				
3.5	Do records show that all water used in equipment cleaning processes (Tables, belts, bins, etc.) is tested for generic E. coli or that sufficient disinfectant was used?				
3.6.0	Do the records document all of the following:				
3.6.1	An 100 ml water sample was aseptically collected at the point of use or a continuous disinfectant monitor was in operations.				

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3.6.2	The generic E.coli testing methodology is specified on the test report and meets the 15 tube MPN (FDA BAM) or other U.S. EPA, AOAC, or other method accredited for quantitative monitoring of water for generic E. coli.				
3.6.3	The records indicate that the operation monitors disinfectant levels during re-hydration, product coring in the field and product cooling.				
3.6.4	The records indicate the testing procedure/equipment that was used for monitoring the disinfectant levels (Indicate the procedure/equipment type).				
3.6.5	Can the water test record be linked to individual field blocks?				
3.6.6	Is the person collecting the sample or monitoring the process recorded?				
3.6.7	Is the location of where the sample was taken recorded?				
3.6.8	Do the records show the name of the test laboratory?				

**Section Score**

# Lettuce and Leafy Greens Verification Audit

Soil Amendments				
	Record			
	Location	Finding	Status	Comment
1	1. Soil amendments contain raw or partially composted animal manure (Table 2).			
1.1	Has raw or partially composted animal manure been applied in the last 1 year?			
1.1.1	If "Yes" to 1.1, were any of these fields used in the production of leafy greens?			
2	2. Soil amendments contain composted manure (Table 2 & Figure 2A)			
2.1	Has a soil amendment containing fully composted animal manure been applied to the field within the last year?			
2.2.0	Are Process Validation records available for review?			
2.2.1.0	If the Enclosed or Within-Vessel Composting method is used, do the records show:			
2.2.1.1	...that the active compost maintained a minimum of 131oF for 3 days?			
2.2.1.2	...that a curing/aging period of at least 45 days before application to fields was followed?			
2.2.2.0	If the Windrow Composting method is used do the records show:			
2.2.2.1	...that the active compost maintained aerobic conditions for a minimum of 131oF for 15 days			
2.2.2.2	...a minimum of five turnings			
2.2.2.3	...followed by a curing/aging period of at least 45 days before application to fields.			
2.2.3.0	If the Aerated Static Pile Composting method is used do the records show that:			
2.2.3.1	...the active compost was covered with 6 to 12 inches of insulating materials			
2.2.3.2	...maintain a minimum of 131oF for 3 days			
2.2.3.3	...a curing/aging period of at least 45 days before application to fields.			
2.3	Has each lot of composted material that is equal to or less than 5000 cubic yards been tested as required			
2.4	Has each lot of composted material been applied to the production location more than 45 days before harvest?			
2.5.0	Records must be available to document the following criteria have been meet for each lot of compost containing animal material used.			
2.5.1.1	a. Acceptance criteria			
2.5.1.2	· Fecal coliforms: <1000 MPN/gram			
2.5.1.3	· Salmonella: Negative per sample size of the prescribed test			
2.5.1.4	· E. coli O157:H7: Negative per sample size of the prescribed test			
2.5.2.1	b. Recommended test methods			
2.5.2.2	· Fecal coliforms: 9 tube MPN			
2.5.2.3	· Salmonella spp: U.S. EPA Method 1682			
2.5.2.4	· E. coli O157:H7: Any laboratory validated method for compost			
2.5.2.5	· Other U.S. EPA, FDA, or AOAC-accredited methods may be used as appropriate.			
2.5.3.1	c. Sampling plan			
2.5.3.2	· 12 point sampling plan composite sample			
2.5.3.3	· Sample may be taken by the supplier if trained by the testing laboratory			
2.5.3.4	· Laboratory must be certified/accredited			

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3	3. Soil amendments that are not organic and do not contain animal manure (Table 2).				
3.1	Is a Letter of Guaranty or other comparable documentation available that shows the soil amendments do not contain animal manure?				
3.2	Show the name of the authority issuing the Letter of Guaranty or other comparable document				
4	4. Soil amendments that are chemically organic and do not contain animal manure (Table 2).				
4.1	Is a Letter of Guaranty or other comparable documentation available that shows the soil amendments do not contain animal manure?				
4.2	Show the name of the authority issuing the Letter of Guaranty or other comparable document				
5	5. Soil amendments that contain animal manure that are physically heat treated or processed by other equivalent methods				
5.1	Are process records or other comparable documentation available that show the lethality of the process?				
5.2	Show the name of the process authority issuing the Letter of Guaranty or other comparable document				
5.3.0	Records must be available to document the following criteria have been meet for each lot of physically heat treated or processed by other equivalent method compost containing animal material used.				
5.3.1.0	a. Acceptance criteria				
5.3.1.1	Fecal coliforms: Negative MPN/gram				
5.3.1.2	Salmonella: Negative per sample size of the prescribed test				
5.3.1.3	E. coli O157:H7: Negative per sample size of the prescribed test				
5.3.2.0	b. Recommended test methods				
5.3.2.1	Fecal coliforms: 9 tube MPN				
5.3.2.2	Salmonella spp: U.S. EPA Method 1682				
5.3.2.3	E. coli O157:H7: Any laboratory validated method for compost				
5.3.2.4	Other U.S. EPA, FDA, or AOAC-accredited methods may be used as appropriate.				
5.3.3.0	c. Sampling plan				
5.3.3.1	12 point sampling plan composite sample				
5.3.3.2	Sample may be taken by the supplier if trained by the testing laboratory				
5.3.3.3	Laboratory must be certified/accredited				
6	6. Soil amendments that are Non-Synthetic Crop Treatments (compost teas, fish emulsions, fish meal, blood meal, bio-fertilizers, etc) Table 3 & Figure 3).				
6.1	Has a non-synthetic crop treatment been applied to the crop?				
6.1.1	If "yes" to above, was this application to the edible portion of the crop?				
6.2	Is a letter of compliance or comparable document outlining the actual conditions of use and conformance to standards available for review (including presence of animal products or manure)?				
6.3	Records must be available to document the following criteria have been meet for each lot of non-synthetic crop treatment used.				
6.3	Did each lot/batch used meet the microbial criteria identified below?				

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6.3.1	Salmonella: Negative per sample size of the prescribed test				
6.3.2	E. coli O157:H7: Negative per sample size of the prescribed test				
6.3.3	If this treatment is applied as a liquid does the solution meet the microbial criteria set forth for pre-harvest non-foliar water application? (5-sample geometric mean of 126 MPN/100 ml and no sample >576 MPN/100 ml)				
	Application intervals were met:				
6.4	Was this non-synthetic crop treatment produced using a validated process for pathogen control?				
6.4.1	If "No" to above, was the treatment applied at least 45 days before harvest?				
6.4.2	If "Yes", are process validation records and documentation available to show that the process is capable of reducing pathogens of human health significance to acceptable levels.				
	Acceptable testing methods were followed:				
6.5.1	Salmonella spp: U.S. E.P.A. Method 1682				
6.5.2	E. coli O157:H7: Any laboratory validated method for compost sampling				
6.5.3	Other U.S. EPA, FDA, or AOAC-accredited methods may be used as appropriate.				
	The proper sampling plan was followed:				
6.6.1	Solid: 12 point sampling plan composite sample				
6.6.2	Liquid: Single well-mixed sample per lot				
6.6.3	Sample may be taken by the supplier if trained by the testing laboratory				
6.6.4	Laboratory must be certified/accredited by annual review of laboratory protocols based on GLPs by recognized NGO.				
	<b>d. Testing Frequency:</b>				
6.7	Each lot before application to production fields.				
6.7.1	Identify the crop treatment.				
6.7.2	Show the name of the laboratory completing the testing.				
6.7.3	Show date of application ?				
6.7.4	Does it show the date of harvest?				
6.7.5	Show the supplier name.				

**Section Score**



# Lettuce and Leafy Greens Verification Audit

## Environmental Assessment Overview

### Record

Location

Finding

Status

Comment

1	<b>General Requirements</b>				
1.1	Was a Pre-Plant Ranch Assessment completed?				
1.2.0	Did it address the following areas?				
1.2.1	Water sources and distribution systems?				
1.2.2	Adjacent land use?				
1.2.3	Animal (Livestock, domestic and wildlife) activity?				
1.2.4	Recent field history?				
1.2.5	Was it completed within 7 days of first seasonal planting?				
1.3	Was a Pre-Harvest Assessment conducted within 7 days for each harvested lot?				
1.4.0	Did it address the following areas?				
1.4.1	Animal intrusion				
1.4.2	Unusual events (e.g.: flooding)				
1.4.3	Potential contamination materials (i.e.: compost pile, glass, paper, etc.)				
1.4.4	Condition of water source and distribution system				
1.4.5	Unexpected adjacent land activity				
1.4.6	Worker hygiene and sanitary facilities				
	<b>Pre-Plant Assessment</b>				
	<b>Water</b>				
2.1	Are all of the water sources and associated distribution systems clearly identified?				
2.2	Was a sanitary survey completed for each water source?				
	<b>Adjacent Land Use</b>				
2.3	Are there compost operations within 400' of the crop edge?				
2.3.1	Are there topographical or climate features that indicate that 400' is too short a distance?				
2.3.2	Are corrective measures in place?				
2.4	Is there a CAFO within 400' of the edge of the crop?				
2.4.1	Are there topographical or climate features that indicate that 400' is too short a distance?				
2.4.2	Are corrective measures in place?				
2.5	Are there non-synthetic soil amendments stored within 400' of the edge of the crop?				
2.5.1	Are there topographical features that indicate that 400' is too short a distance?				
2.5.2	Are corrective measures in place?				
2.6	Are grazing lands/domestic animals within 30' from the edge of the crop?				
2.6.1	Are there topographical or climate features that indicate that 30' is too short a distance?				
2.6.2	Are corrective measures in place?				
2.7	Are the ends of the septic leach field (home or other building) within 30' of the edge of the crop?				
2.7.1	Are there topographical or climate features that indicate that 30' is too short a distance?				

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2.7.2	Are corrective measures in place?				
2.8	Are any well heads within 200' from untreated manure?				
2.8.1	Are there topographical or climate features that indicate that 200' is too short a distance?				
2.8.2	Are corrective measures in place?				
2.9	Does documentation justify the buffer zone distance for all surface water sources on the ranch and their separation from untreated manure (raw manure and partially composted manure) as follows?				
2.9.1	100' for sandy soil with a slope <6%				
2.9.2	200' for loamy or clay soil with a slope <6%				
2.9.3	300' for all slopes >6%				
2.10	Is a buffer distance maintained between the crop edge and riparian areas?				
2.10.1	Is this distance based on a risk assessment or authoritative citation?				
<b>Animal Activity</b>					
2.11	Did the survey identify any of the following:				
2.11.1	Animal migration patterns/presence of animals				
2.11.2	Fencing in disrepair				
2.11.3	Animal feces				
2.12	Were specific actions identified to correct any deficiencies?				
2.12.1	Is documentation available to show that actions were implemented?				
2.12.2	Has an on-going program established to monitor the effectiveness of the actions?				
<b>Recent Field History</b>					
2.13	Did the survey identify any of the following:				
2.13.1	History of flooding within the last 60 days				
2.13.2	History of grazing on the crop land within the last 1 year				
2.13.3	History of hazardous activity including but not limited to CAFO, municipal waste, toxic waste, landfill, etc?				
2.13.4	If yes, have appropriate remedial activities been completed and documented?				
<b>Pre-Harvest Assessment</b>					
<b>Animal Intrusion</b>					
3.1	Was evidence of animal intrusion into the crop field noted (in the form of animals present, animal tracks, feces/urine evidence or plant feeding )?				
3.1.1	If "Yes", was a food safety assessment completed?				
3.1.1.1	Is the individual who conducted the assessment identified?				
3.1.1.2	Is the date of the assessment documented?				
3.1.1.3	Were remedial actions formulated?				
3.1.2	If "yes", was the field harvested?				
3.1.2.1	If "Yes", is there documentation to show the remedial actions were followed?				
3.1.3	Did the remedial action include creation "no harvest" buffer zones around the intrusion?				
3.1.4	Is documentation which fully delineates the animal intrusion available for review?				
<b>Unusual Events (e.g.: flooding)</b>					
3.2	Does the Pre-Plant Ranch Assessment identify any blocks that are susceptible to flooding?				

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3.2.1.1.1	If "Yes" do the records indicate that any of the fields were flooded at any time during the crop cycle?				
3.2.1.1.1.1	If "Yes" is there documentation to indicate the extent of flooding and the area of crop impacted?				
3.2.1.1.1.1.1	If "Yes", was the product harvested?				
3.2.1.1.1.1.1.1	If "yes", was a 30' (min) "no harvest" buffer from the high water mark established?				
3.2.1.1.1.2	Are these remedial activities documented?				
3.3	Is there any evidence of any other type of potential contamination event?				
3.3.1	If "Yes", was a food safety assessment completed?				
3.3.1.1	Is the individual who conducted the assessment identified?				
3.3.1.2	Is the date of the assessment documented?				
3.3.1.3	Were remedial actions formulated?				
3.3.2	If "yes", was the field harvested?				
3.3.2.1	If "Yes", is there documentation to show the remedial actions were followed?				
3.3.2.2	Did the remedial action include creation "no harvest" buffer zones around the intrusion?				
3.3.3	Is documentation which fully delineates the potential contamination available for review?				
	<b>Potential contamination materials (i.e.: compost pile, glass, paper, etc.)</b>				
4.1	Is there any evidence that materials that could potentially contaminate the crop has been moved into adjacent fields?				
4.1.1	If "Yes", was a food safety assessment completed?				
4.1.1.1	Is the individual who conducted the assessment identified?				
4.1.1.2	Is the date of the assessment documented?				
4.1.1.3	Were remedial actions formulated?				
4.1.1.3.1	If "yes", was the field harvested?				
4.1.1.3.2	If "Yes", is there documentation to show the remedial actions were followed?				
4.1.1.3.2.1	Did the remedial action include creation "no harvest" buffer zones around the intrusion?				
4.1.1.3.2.2	Is documentation which fully delineates the potential contamination available for review?				
	<b>Unexpected Adjacent Land Activity</b>				
5.1	Has the food safety status of the adjacent land changed since the pre-plant assessment was conducted?				
5.1.1	If "Yes", was a food safety assessment completed?				
5.1.1.1	Is the individual who conducted the assessment identified?				
5.1.1.2	Is the date of the assessment documented?				
5.1.1.3	Were remedial actions formulated?				
5.1.1.3.1	If "yes", was the field harvested?				
5.1.1.3.1.1	If "Yes", is there documentation to show the remedial actions were followed?				
5.1.1.3.1.2	Did the remedial action include creation "no harvest" buffer zones around the intrusion?				

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5.1.1.3.1.3	Is documentation which fully delineates the potential contamination available for review?				
<b>Worker Hygiene and Sanitary Facilities</b>					
6.1	Is there any evidence that worker hygiene rules have been violated during the crop cycle?				
6.1.1	If "Yes", was a food safety assessment completed?				
6.1.1.1	Is the individual who conducted the assessment identified?				
6.1.1.2	Is the date of the assessment documented?				
6.1.1.3	Were remedial actions formulated?				
6.1.1.3.1	If "yes", was the field harvested?				
6.1.1.2.1.1	If "Yes", is there documentation to show the remedial actions were followed?				
6.1.1.2.1.2	Did the remedial action include creation "no harvest" buffer zones around the intrusion?				
6.1.1.2.1.3	Is documentation which fully delineates the potential contamination available for review?				
6.2	Is the date of planting recorded?				
6.3	Is the date of the assessment recorded?				
6.4	Is the expected date of harvest recorded?				
6.4.1	Was the harvest started within 7 days of the completed assessment?				
6.5	Are the specific growing blocks associated with the assessment clearly identified?				
6.6	Is the commodity to be harvested recorded?				
6.7	Is the Grower name and contact information documented?				

**Section Score**

# Lettuce and Leafy Greens Verification Audit

## Worker Practices

### Record

#### Growing and Harvesting

#### Location

#### Finding

#### Status

#### Comment

1	<b>General Requirements</b>				
1.1	Is there a written policy for all employees and all visitors to the field location which describes the required hygiene rules?				
1.2.0	Does the Policy address the following:				
1.2.1	Sanitary Facilities				
1.2.2	Field Worker Practices (GMP's, GHP's, etc.)				
1.2.3	Worker Health Practices				
1.3	Is there an SOP to insure that potable water is available to all workers?				
2	<b>Sanitary Facilities</b>				
2.1	Is there a documented field sanitary facility program?				
2.2.0	Does the Field Sanitary Facility Program address the following:				
2.2.1	The number, condition, and placement of field sanitation units complies with applicable state and/or federal regulations.				
2.2.2	Sanitary facilities are readily accessible (proximate) to the work area.				
2.2.3	Sanitary facilities are regularly maintained throughout the day.				
2.2.4	Sanitary facilities have sufficient consumable supplies (i.e.: hand soap, water, paper towels, toilet paper, etc)				
2.2.5	Readily understandable signs are posted to instruct employees to wash their hands before beginning or returning to work.				
2.2.6	Field sanitation facilities are cleaned and serviced on a scheduled basis and at a location that minimizes the potential risk for product contamination.				
2.2.7	Address the placement of the sanitary facility in order to minimize any impact on the crop in the field including:				
2.2.8	Minimize the impact on the crop from leaks and/or spills				
2.2.9	Ability to access the unit for service				
2.2.10	Documented response plan in the event of a major leak and/or spill				
3	<b>Field Worker Practices (GMPs, GHPs, etc.)</b>				
3.1	Is there a written worker practices program?				
3.2.0	Are employee work rules established which address the following:				
3.2.1	Training on proper sanitation and hygiene practices				
3.2.2	Requirement for workers to wash their hands before beginning or returning to work.				
3.2.3	Smoking, eating and drinking are confined to designated areas separate from where product is grown.				
3.2.4	Proper use of pre-harvest and/or post harvest application materials.				
3.2.5	Are improperly stored personal items observed in the field?				
3.2.6	Where required, the proper wearing of head and facial hair restraints				
3.2.7	Where required, the proper wearing of apron and other food safety apparel				
3.2.8	The appropriate use and sanitation of gloves				
3.2.9	Removal of visible jewelry (rings, bracelets, necklaces, body piercings, etc.) prior to the start of work.				

## Lettuce and Leafy Greens Verification Audit

3.2.10	Removal of all objects from pockets.				
3.2.11	Proper storage of clothing and personal items.				
3.2.12	Proper cleaning, sanitation and storage of hand harvest equipment (knives, scythes, etc)				
4	<b>Worker Health Practices</b>				
4.1	Is there a written worker health practices program				
4.2.0	Are employee work rules established which address the following:				
4.2.1	Workers with diarrheal disease or symptoms of other infectious disease are prohibited from handling fresh produce.				
4.2.2	Workers with open cuts or lesions are prohibited from handling fresh produce.				
4.2.3	Actions for employee to take in the event of injury or illness.				
4.2.4	A policy describing procedures for handling/disposition of produce or food contact surfaces that have come into contact with blood or other body fluids.				

**Section Score**

# Lettuce and Leafy Greens Verification Audit

Field Sanitation					
		Record			
		Location	Finding	Status	Comment
1	General Requirements				
	Is there a written policy for all employees and all visitors to the field location which describes the required field sanitation SOPs?				
1.1	Does this policy address the following:				
1.2.0	Field activities				
1.2.1	Harvest activities				
2	Field Activities				
2.1.0	Does the written field activity SOP address the following:				
	Cross contamination by farming equipment that comes into contact with raw manure, untreated compost, waters of unknown quality, wildlife or domestic animals or other potential sources				
2.1.1	If "yes", does it appropriately restrict the use or require a documented cleaning and sanitation program of the equipment?				
2.1.1.1	If cleaning and sanitation is required, are records of the cleaning/sanitation available for review.				
2.1.1.2	Agrochemical storage and handling				
2.1.2	Field debris removal (drip tape, plastic mulch, irrigation fittings, sticks and woody plant material, etc)				
2.1.3	Appropriate refuse containers for worker trash				
3	Harvest Activities				
3.1.0	Does the written harvest activity SOP address the following:				
3.1.1	Is a specific individual assigned the food safety responsibility for harvesting?				
3.1.1.1	Is a documented daily food safety harvest assessment available for review?				
3.1.1.2	Is the assessment dated?				
3.1.1.3	Is the individual who conducted the assessment identified?				
3.1.1.4	Are the specific growing blocks associated with the assessment clearly identified?				
3.1.1.5	Is the Harvester name and contact information documented?				
3.1.1.6	Does it require an assessment of animal intrusion into the field?				
3.1.1.6.1	If yes, is evidence of animal intrusion documented?				
3.1.1.6.1.1	If yes, does it document that appropriate remedial actions been taken?				
3.1.2	SSOP of harvest equipment addressing the following				
3.1.2.1	Frequency of cleaning and sanitation				
3.1.2.2	Chemical usage and record keeping				
3.1.2.3	Equipment specific cleaning instructions				
3.1.2.4	Chemical storage				
3.1.2.5	All chemical storage containers are labeled appropriately				
3.1.2.6	Sanitation verification				
3.1.2.7	Daily inspection				
3.1.2.8	Periodic microbial swabs or other equivalent indicator				
3.1.3	SOP for handling and storage of product containers addressing the following				

### Lettuce and Leafy Greens Verification Audit

3.1.3.1	Over night storage				
3.1.3.2	Contact with the ground				
3.1.3.3	Container assembly (RPC, fiber bin, plastic bin, etc)				
3.1.3.4	Damaged containers				
3.1.3.5	Use of containers only as intended				
3.1.4	SOP for sanitary operation of equipment				
3.1.4.1	is broken glass addressed				
3.1.4.2	are spills and leaks addressed				
3.1.4.3	inoperative water sprays				
3.1.5	Harvest equipment protection				
3.1.5.1	Overnight equipment storage				
3.1.5.2	Road transport of equipment				
3.1.6	Written corrective actions for all of the above.				

**Section Score**



Overall Assessment

Status

- Pre-Requisite Requirements
  - Water Use
  - Soil Amendments
- Environmental Assessment Overview
  - Worker Practices
  - Field Sanitation

# Commodity Specific Food Safety Guidelines for the Production and Harvest of lettuce and Leafy Greens

## Field Observations

	Finding	Status	Comment
<b>Water Use</b>			
Are there any active and/or inactive water sources that have not been recorded in Section 1.5 of the Environmental Factors Audit?			
From visual inspection, is there any evidence that the water distribution systems are inadequately maintained?			
From visual inspection, is there any evidence that the water sources and distribution systems may have become contaminated?			
<b>Section Score</b>			
<b>Soil Amendments</b>			
Is there any evidence of undocumented use of soil amendments?			
Is there any evidence of improperly applied soil amendments?			
Is there any evidence of improperly stored soil amendments?			
<b>Section Score</b>			
<b>Environmental Factors</b>			
Is there evidence of fecal contamination in the field?			
Is there evidence of livestock, poultry, significant wildlife and/or domestic animals in the field?			
Is there evidence of non-compliance with distances as outlined in Sections 2.3 through 2.10 of Environmental Factors?			
Is there evidence that all animal barriers (fences, gates, grates, etc) are not in good repair and operational?			
<b>Section Score</b>			
<b>Work Practices</b>			
Are any employees eating, chewing tobacco or smoking in actively harvested area?			

## Commodity Specific Food Safety Guidelines for the Production and Harvest of lettuce and Leafy Greens

Field Observations			
	Finding	Status	Comment
Were any employees observed to not have washed their hands after; restroom usage, work breaks, or any returning to work occasion?			
Is there any evidence that sanitary facilities are not routinely clean and operational?			
Is there any evidence that sanitary facilities are not adequately stocked with disposable supplies?			
Are improperly stored personal items observed in the field?			
Is there any evidence or observations that employees are not using the restrooms?			
Are there any employees with uncovered wounds, boils or cuts?			
Are there any employees with symptoms of infection or contagious disease?			
<b>Section Score</b>			
<b>Field Sanitation</b>			
Is there any evidence of excessive non-vegetative debris in the field?			
Is there evidence of open and/or unsupervised chemicals in the field?			
Is there any evidence of leaks and spills on equipment in the field?			
Is there any evidence of the use of non-sanitized farm equipment that may have come in contact with raw manure, untreated compost, waters of unknown quality, wildlife or domestic animals?			
<b>Section Score</b>			